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UNITED STATES DISTRICT COURT

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FOR THE WESTERN DISTRICT OF WASHINGTON

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ORGANO GOLD INT'L, INC.,
a Washington corporation,
 	
                 Plaintiff,
 	
       v.
 	
LUIS VENTURA, an individual,
LUZ ANGELA VENTURA, an individual;
L&A VENTURA MANAGEMENT, INC.,
a Texas corporation,
 	
                Defendants.
	NO.
	
	DECLARATION OF LUIS VENTURA IN
	SUPPORT OF NOTICE OF REMOVAL

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21   I, Luis Ventura, hereby declare as follows:

22   1.   I have personal knowledge as to the matters set forth herein and base this

23 declaration on that personal knowledge.

24   2.   I am and was a resident of the State of Texas at all times pertinent to this matter.

25 To date, I have not been served with the Summons and Complaint in this action.

26   3.   Defendant Luz Angela Ventura ("Angela") is my ex-wife. On April 3, 2016, I

27 spoke by telephone with Angela, and Angela advised me that she has not been served with any

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legal papers pertaining to this lawsuit. Based on this advice, which I believe to be correct, I am informed and believe that Angela has not yet been served with the Summons and Complaint.

4.   I have reviewed the Complaint filed by Plaintiff Organo Gold Int'l, Inc. ("Plaintiff") in Whatcom County Superior Court against me, Luz Angela Ventura, and L&A Ventura Management, Inc. I vigorously dispute all of the claims against us.

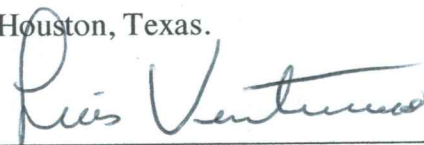5.   I am the president of L&A Ventura Management, Inc., whose principal place of business was Coppell, Texas.

6.   I served as a distributor for Plaintiff between July 2009 and February 19, 2016. In 2015, my earned income was approximately $579,000. In 2014, my earned income was approximately $974,000. In 2013, my earned income was approximately $1.3 million.

7.   Following Plaintiff's termination of my distributor status, I started a new business venture with Total Life Changes, LLC. I would not be involved in this new venture if I did not believe that I would earn as much or more than I did while associated with Plaintiff. So far, in the short period since I started this new business venture, I have generated approximately $44,000 in earned income.

8.   I do not believe that starting or operating this new venture with Total Life Changes, LLC is in violation of any applicable contract or law and I intend to prove that in this action. Nonetheless, with its lawsuit, I understand Plaintiff seeks "injunctive relief" to stop L&A Ventura Management, Inc., Ms. Ventura and me from earning a living through our chosen profession. Without admitting any of the allegations in the Complaint, if a court were to grant the injunctive relief sought, based upon my good faith belief and my past earning history, I am confident that I would suffer losses far in excess of $75,000 if I was not able to work for a year.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of April, 2016 at Houston, Texas.

_____
Luis Ventura